UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

July 22, 2014

Ken Rose, PE, PG
Director of Engineering & Environmental Services
OmniTRAX, Inc., 252 Clayton St., 3rd Floor, Denver, CO 80206

Dear Mr. Rose,

U.S. EPA has reviewed the Site Investigation Report for the Illinois Railway Property in Wedron, Illinois. Attached are U.S. EPA comments, including changes that you must incorporate into the report.

Section 1.3, Previous Investigations Page 1-2: On page 1-2, the second complete paragraph refers to "Route 71". This should be changed to Route 21.
The third bullet references seven soil boring location samples which had detection limits for benzene that exceeded the Migration to Groundwater SRO because of high concentrations of other compounds. However, in Section 3.2, Analytical Soil Results, and in Section 4, Conclusions, the fourth bullet in each section states that six boring locations had the high benzene detection limits. Verify the correct number of boring locations and edit the report to reflect the correct number.

Section 4, Page 4-1: The last paragraph describes the information on Figure 5 and recommends some additional investigation, but does not provide any justification for the monitoring well locations in the figure. All locations for the proposed wells seem to be away from the locations of soil borings with the highest contamination. Include the reasoning behind the selected monitoring well locations in this section.

Section 2.2, Subsurface Soil Investigation. The second paragraph refers to soil borings SB1 through SB15. Change the soil boring IDs to GP-1 through GP-15 to match the figures and analytical data.

Section 2.2, Subsurface Soil Investigation. Describe any field preservation Illinois Railway used in this section (encores, methanol pre-preserved vials, etc.).

Section 2.3, Groundwater Investigation
This section states that groundwater was sampled using a low flow technique with Submersible pump. Describe the type of pump used (bladder, etc.) and flow rate in this section. Also describe any field preservation used in this section (hydrochloric acid, etc.).

Section 2.5, Quality Assurance/Quality Control. Discuss the results of the data validation in this section. Include a summary of the data validation report's findings (biased sample results, elevated detection limits, etc.), and provide a statement regarding the usability of the data sets and whether the data met the Data Quality Objectives for the project. Include all data validation reports as an attachment to the Site Investigation Report.

Table 3, Groundwater Field Measurements. Change the second column heading to "Top of Casing Elevation". Although intuitive, reference the elevations to a datum, such as feet above mean sea level.

Section 3.2, Analytical Soil Results. Remove the word "proposed" from the second sentence in the first paragraph.

Section 4, Conclusions. Include an interpretation of the data, not just a summary of the results, in the Conclusions section.

-Discuss what effect the high detection limit has on the results in this section. For example, did some samples fall below the screening levels for all compounds because they were non-detect with elevated detection limits?

-Discuss how soil and ground water contamination from property owned by Illinois Railway, which was identified as a result of the site investigation, may be affecting neighboring groundwater and residential wells.

-Discuss whether additional investigation is required. U.S. EPA will require additional investigation and potentially remediation of the contaminated soil and ground water above SROs.

-The very last sentence of page 4-1 says that MW-15 is located east of Wedron Silica. This should say "west of Wedron Silica."

Figures 1 and 2. Edit the figures to keep the call-outs the same from one figure to the other for clarity and accuracy. For example, on Figure 1 there is "UST #3 (Dec 2013)", yet on Figure 2 this same feature is identified as "UST".

In summary, U.S. EPA's most significant comments are 1) include all data validation reports, and 2) the Conclusions section must include an interpretation of the data. The Conclusions Section must also include figures showing the interpreted nature and extent of contamination in soil and groundwater in the interpretation, as well as a hypothesis of potential sources. Further, U.S. EPA recommends that Illinois Railway conduct risk-based corrective action (RBCA) modeling to determine if soil or water contamination from property owned by Illinois Railway is contributing to groundwater contamination in residential wells in Wedron.

U.S. EPA looks forward to setting up a meeting to discuss these comments and follow up investigation work. Please contact me as soon as possible to schedule this meeting.

Sincerely,

Steve Faryan, USEPA
On-Scene Coordinator
Emergency Response Branch
312-353-9351

Cc: Christopher Albrecht, CDM Smith

Bcc: Jacqueline Clark, ORC
Tom Kenney, ORC